UNITED STATES DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE WASHINGTON, DC

FSIS DIRECTIVE

8080.1 Rev. 3

1/19/00

RECALL OF MEAT AND POULTRY PRODUCTS

I. PURPOSE

This directive provides the terminology, responsibilities, and public notification procedures regarding the voluntary recall of FSIS-inspected meat and poultry products. **Note**: FDA oversees egg product recalls in accordance with the Egg Products Inspection Act and two Memorandums of Understanding between the Health and Human Services and United States Department Agriculture (dated June 7, 1983 and February 23, 1999).

II. REASON FOR REISSUANCE

This revision updates the current directive to account for FSIS' reorganization and will provide plain-language definitions and instructions. FSIS is reissuing this directive in its entirety.

III. CANCELLATION

FSIS Directive 8080.1, Rev. 2, dated 11/3/92

IV. REFERENCES

The Federal Meat Inspection Act and the Poultry Products Inspection Act

V. POLICY

- A. A recall is a firm's voluntary removal of product from trade or consumer channels (e.g., manufacturers or importers) to protect the public from consuming adulterated or misbranded products. A recall may be an alternative to an FSIS detention or seizure of adulterated or misbranded products. Although recalls are voluntary, FSIS oversees all recall activities by official meat and poultry establishments and coordinates any FSIS actions with the recall taken by the firm. For recalls conducted by state-inspected firms or retail establishments, the appropriate state agency oversees the recall in most cases. FSIS will provide the state agencies any needed assistance and information.
- B. When firms recall product on their own initiative, FSIS expects firms to notify the Emergency Response Division (ERD), Office of Public Health and Science. However, if other FSIS program personnel in their District are contacted, those program employees should contact ERD as soon as possible.

DISTRIBUTION: Inspection Offices; T/A Inspectors; OPI: OPPDE Plant Mgt; T/A Plant Mgt; TRA; ABB; PRD; Import

Offices

VI. TERMINOLOGY

The following are common terms FSIS uses related to recalls.

- A. **Recall**. A firm's voluntary removal of distributed meat or poultry products from commerce when there is reason to believe that such products are adulterated or misbranded under the provisions of the Federal Meat Inspection Act (FMIA) or the Poultry Products Inspection Act (PPIA). "Recall" does not include a market withdrawal or a stock recovery.
- B. **Market Withdrawal**. A firm's removal or correction by its own volition of a distributed product that involves a minor infraction that would not warrant legal action by FSIS, or that involves no violation of the FMIA or the PPIA, or no health hazard.
- C. **Stock Recovery**. A firm's removal or correction of product that has not been marketed or that has not left the direct control of the firm. For example, product is located on premises owned by, or under the control of, the firm, and no portion of the lot has been released for sale or use.
- D. **Recall Classifications**. FSIS assesses the public health concern or hazard presented by a product being recalled, or considered for recall, whether firm-initiated or requested by FSIS, and classifies the concern as one of the following:
- 1. <u>Class I</u>. This is a health hazard situation where there is a reasonable probability that the use of the product will cause serious, adverse health consequences or death. For example, the presence of pathogens in ready-to-eat product or the presence of *E. coli* O157:H7 in ground beef.
- 2. <u>Class II</u>. This is a health hazard situation where there is a remote probability of adverse health consequences from the use of the product. For example, the presence of undeclared allergens such as milk or soy products.
- 3. <u>Class III</u>. This is a situation where the use of the product will not cause adverse health consequences. For example, the presence of undeclared generally recognized as safe non-allergen substances, such as excess water.
- E. **Depth of Recall**. The level of product distribution to which the recall is to extend:
- 1. Consumer This includes household consumers as well as all other levels of distribution.
 - 2. Retail level The level that includes all retail sales of the recalled product.

- 3. User level- This level includes hotels, restaurants, and other food service institutional consignees.
- 4. Wholesale level The distribution level between the manufacturer and the retailer. This level may not be encountered in every recall situation; i.e., the recalling firm may sell directly to the retail or consumer level.
- F. **Scope**. This defines the amount and kind of product in question. For example, all products produced under a single HACCP plan between performance of complete cleaning and sanitation procedures (clean up to clean up).
- G. **Disposition**. The firm's action to correct a situation leading to the recall such as relabeling, reworking, or destroying product.
- H. Health Hazard Evaluation Board (HHEB). If the risk to the public health appears to be unique or in some way unusual, the Recall Committee may consult the FSIS Health Hazard Evaluation Board (HHEB), which has been established by the Agency to evaluate the potential risk to the public associated with the consumption of a product. When necessary, the director of Epidemiology and Risk Assessment Division (ERAD) convenes the board, made up of physicians, health scientists, microbiologists, toxicologists, and chemists, together. The HHEB's work is directed at products that present unusual or unique causes of health hazards, such as residues that have not been seen in food products in the past. The HHEB then provides an independent recommendation to the Recall Committee.
- I. **Recall Committee**. A committee of representatives from various FSIS divisions and staffs assembled to respond to potential or real health hazard incidents reported to ERD. The committee consists of representatives from the following program areas:
 - 1. District Office, OFO
 - 2. Technical Service Center, OFO
 - 3. Compliance and Investigations Division, OFO
 - 4. Microbiology Division, OPHS
 - 5. Epidemiology and Risk Assessment Division, OPHS
 - 6. Chemistry and Toxicology Division, OPHS
 - 7. International Policy Division, OPPDE
 - 8. Congressional and Public Affairs (Media Relations), OA
 - Other federal or state Agencies as appropriate (e.g., Food and Drug Administration, Food and Nutrition Service, Office of the General Counsel, state departments of public health, etc.)

VII. PROCEDURE TO DETERMINE THE NEED FOR A RECALL

The following is the general procedure involved with a recall.

- A. Health Hazard Evaluation. Typically, there is a precedent for determining the potential health hazards of an adulterated product and the classification of the hazard (V.D.). When there are any questions, particularly with unprecedented hazards the HHEB will convene and conduct an evaluation that is then submitted to the DA/OPHS and ERD for consideration. An evaluation will include at least the following factors:
- 1. the nature of the violation or defect (i.e., whether the product is adulterated, improperly labeled, misbranded, or unwholesome),
 - 2. the occurrence of any illnesses or injuries,
 - 3. the likelihood that illnesses or injuries may result,
 - 4. the type of illnesses or injuries that may result.
- B. Recall Classification. Based on the health hazard evaluation, the committee will assign the classification, i.e., Class I, Class II, or Class III.

C. Recall Recommendation

- 1. The recall committee considers the following factors when preparing a recall recommendation for approval by the DA/OPHS:
 - a. the recall classification
 - b. the depth
 - c. the scope
- d. the ability of distributors, consumers, or users of the products to identify the product in question
 - e. the estimated amount of product in distribution
 - f. area of distribution
- g. the firm's proposed recall strategy, (i.e., the way the firm will coordinate the retrieval and disposition of the product

Note: Much of the above information is generally provided to the Recall Committee by the recalling firm through documents or orally through telephone conference calls. Before

deciding on a recommendation, ERD will request that FSIS field inspection or enforcement personnel verify the information provided by the firm.

D. Recall Request. ERD will send the recall committee's recommendation to the DA/OPHS. If he or she determines that a recall request is necessary, ERD will contact the firm to make the formal request for a recall. ERD will then notify the appropriate Federal, State, and local agencies of the product recall.

VIII. ACTION BY FIRM

FSIS has prepared a "Product Recall Guidelines for Firms" (Amendment 2). This guide outlines the actions that FSIS expects a firm to take in the event that the firm decides to recall product.

IX. PUBLIC NOTIFICATION

- A. Press Releases. FSIS will issue a press release for all recalls. ERD coordinates with the Congressional and Public Affairs Office to develop the press release.
- 1. Press releases clearly describe the product being recalled along with any identifying marks or codes, the reason for the recall, and an explanation of the risk involved in consuming the product.
- 2. Press releases also provide instructions to the public on what to do with the product if they can identify it and have it in their possession, and the name and telephone number of a company contact for consumers with any questions.
- 3. Press releases for recalls of product that are not in the public domain or for product that consumers cannot identify by labeling or packaging will explain that the product is being recalled before becoming consumer-accessible, or that consumers cannot identify the product.
- 4. Press releases will not identify the specific recipients of product (e.g., grocery store, restaurant, airline, etc.) unless the supplier chooses to release the information to the public. However, press releases will provide general information about the product's destination, for example, "The beef burritos were distributed to an airline caterer and restaurants in the states of....." or "Frankfurters were sold to grocery stores, delis, and convenience stores in the states of"
- 5. When there are extenuating circumstances involving foodborne illnesses and contaminated products, but no legal identification of the source, the Under Secretary for Food Safety and the FSIS Administrator may decide to issue an immediate special "educational" press release unrelated to a recall. For example, if a foodborne illness outbreak is identified, and a common source is suspected but not confirmed, FSIS may issue an educational press release that provides guidance to

consumers and health professionals about the risks of illness associated with the identified pathogen and symptoms.

6. FSIS will issue press releases announcing intrastate recalls and provide the appropriate factual information, including identification of the State that is overseeing the recall.

NOTE: In 2000, FSIS will review the effectiveness of the policy in the above paragraph IX. A.

- B. Recall Notice Report. When there is a recall, ERD prepares a Recall Notification Report (RNR). RNRs provide consumers and the public health community with information related to the product in question. RNRs are posted on the FSIS Recall Website and are electronically distributed to public health and inspection program officials throughout the country. Along with the date and recall case number, RNRs include the following:
- 1. The specific product(s) recalled along with any identifying codes or marks on the packages;
- 2. The name of the recalling firm, a contact at the firm and their phone number(s);
 - 3. The quantity of product recalled;
- 4. The problem with the product or the reason for the recall, and how/when it was discovered;
 - 5. The areas in which the product has been distributed;
 - 6. The classification of the recall and depth or level of the recall;
 - 7. A link to the FSIS press release;
- 8. The firm's recall strategy and follow-up actions to be conducted by FSIS;
 - 9. Other agencies involved; and
 - 10. A list of FSIS contacts with phone numbers.

X. EFFECTIVENESS CHECKS

A. FSIS program personnel perform checks of the effectiveness of a product recall. To conduct these checks, compliance officers obtain distribution information from the firm. They use the distribution information to contact the consignees to determine whether

adulterated product has been removed from commerce. FSIS program personnel record the results of the checks on FSIS Form 8400-4, Report of Recall Effectiveness. (Amendment 1)

- B. The primary purpose of the effectiveness checks is to verify:
- 1. That adequate notice about the recall has been provided to all consignees by the firm conducting the recall.
- 2. That consignees located and controlled products and followed the recalling firm's instructions for removing products.
- C. FSIS program personnel will make a sufficient number of effectiveness checks to verify that the recall action is conducted in an effective manner, and that the firm locating, retrieving, and controlling the product. Also, the checks will verify that the firm is disposing the product in accordance with regulatory requirements.
- D. In the event that effectiveness checks disclose that consignees have not been notified of the product recall or have not acted as requested by the recalling firm, FSIS program personnel will detain any products posing a health risk and notify the firm. If the firm does not take prompt action to contact the consignees with recall instructions, or the consignees fail to act on the product as requested by the firm, District Enforcement personnel may initiate other enforcement actions.
- E. Once it is determined that a recall is completed by the recalling firm, the Director of Compliance and Investigation Division of District Enforcement Operations will send a "closeout" memo to the Director of ERD. The memo summarizes the recall efforts by the firm that is conducting the product recall and the findings of the effectiveness checks.

XI. Closure

A. When ERD determines that the recalling firm has made all reasonable efforts to recall product and has either disposed of the product, or the product is under FSIS control (retention or detention) or documented company control, ERD will submit a recommendation for terminating the recall to DA/OPHS for review. With the concurrence of the DA/OPHS, ERD will notify the firm in writing and modify the RNR to reflect the closure.

Note: If a federally inspected establishment shipped adulterated product, FSIS inspection program personnel will verify that the establishment takes the appropriate corrective actions in accordance with 9 CFR 417.3 (See FSIS Directive 5000.1).

B. ERD should periodically, in consultation with the Evaluation and Assessment Division, OPPDE, evaluate the effectiveness of its recall procedures and reassess these procedures as warranted.

/s/ Philip S. Derfler

Deputy Administrator
Office of Policy, Program Development
and Evaluation

(Note: The computer version of this directive does not include the FSIS Form 8400-4 pages 9 and (10 blank).

PRODUCT RECALL GUIDELINES FOR FIRMS

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1. Background and Objectives

Recall is an effective method of removing violative products that may represent a health hazard to the consumer or user, from commerce. It is an action taken by a manufacturer, distributor, or importer to carry out their responsibility to protect the public health and well being.

Firms have the responsibility to effectively remove from commerce any product that may be adulterated or misbranded, or that is otherwise hazardous to the consumer. A "recall" is an effective method of accomplishing this objective.

A recall can be disruptive to a firm's operation and business, however there are several steps that a firm can take in advance to minimize this disruption. An operator of an inspected establishment should take measures that will ensure rapid and effective recall of products. To achieve this goal, the operator should prepare and maintain a detailed, written recall plan. This plan should describe, step by step, the procedure the firm will follow in case it becomes necessary to recall a product.

Official establishments are required to have HACCP plans that list hazards reasonably likely to occur and that identify in-plant corrective actions when there is a failure to control a critical control point (9 CFR 417.2-417.3). FSIS believes that establishments can use their HACCP plans to identify situations where recalls may be necessary. Using this information, for each identified corrective action, an establishment should determine what recall action would be necessary if violative product entered commerce. There is no regulatory requirement that an establishment include this recall plan in its HACCP plan, however, FSIS believes that prudent establishments would.

2. The Recall Plan

One person should be identified as the Recall Coordinator to prepare for and coordinate all activities related to recalls. The Recall Coordinator should be knowledgeable about every aspect of the firm's operations including purchasing, processing, quality assurance, distribution, and consumer complaints. The Recall Coordinator should select the other members of a Recall Team. The Recall Coordinator should be authorized to make decisions in carrying out a recall and should report to top management at regular, specified intervals.

A recall plan should address the following elements:

- a. Identification of Recall Personnel All internal and external personnel to be involved in the recall actions, along with their respective telephone and facsimile numbers, e-mail addresses, etc., as appropriate, should be identified. For each identified individual, an alternate to act in his or her absence should be specified. The roles and responsibilities of every person identified should be clearly specified.
- b. Recall Procedures The recall plan should specify, in detail, actions the firm will take in deciding whether to recall a product and in effecting the recall should it decide to do so.

- c. Evaluation of Health Hazards Using the hazards identified in its HACCP plan, the firm should correlate and evaluate all known information on the nature and extent of the associated health risks. At a minimum, this evaluation should take into account, the following factors:
 - Whether any disease or injuries have already occurred from the use of the product.
 - Assessment of the hazard to various segments of the population, e.g., children, the elderly, immunocompromised individuals, etc., who are expected to be exposed to the product being considered for recall, with particular attention paid to the hazard to those individuals who may be at greatest risk.
 - Assessment of the relative degree of seriousness of the health hazard to which the population at risk would be exposed.
 - Assessment of the likelihood of occurrence of the hazard.
 - Assessment of the consequences (immediate or long-range) of occurrence of the hazard.
- d. Scope of Recall This defines the amount and kind of product in question and depends on the establishment's HACCP plan and processing operations. As a starting point, all products produced under a single HACCP plan between performance of complete cleaning and sanitation procedures (clean-up to clean-up) should be considered for recall. The scope of the recall may expand or contract from this point. The plan should specify how this is to be determined for various scenarios and contingencies.

A system of product coding sufficient to permit positive identification and to facilitate effective recalls should be in use by all firms.

Product production and distribution records should be maintained as are necessary to facilitate identification and location of products that need to be recalled. Records should be maintained for a period of time that exceeds the shelf life and expected use of the product and at least the length of time specified in the regulations concerning record retention.

- e. Depth of Recall This is dependant upon the degree of hazard and extent of distribution and the level to which the recalled product was distributed. The plan should specify how the depth of recall is to be determined for various scenarios and contingencies. Levels of recall depth may be:
 - Consumer level, includes household consumers as well as all other levels of distribution to reach the household consumer; or
 - Retail level, includes retail sellers and any intermediate wholesale level to reach the retail sellers; or
 - User level, includes hotels, restaurants and other institutional type consignees and any intermediate wholesale level to reach these users; or

• Wholesale level, the distribution level between the manufacturer and retail or user level.

f. Recall Communications - A recalling firm is responsible for promptly notifying each of its affected consignees about the recall. The format, content, and extent of a recall communication should be commensurate with the hazard associated with the product being recalled, the strategy developed, and the recall plan. In general terms, the purpose of a recall communication (see attached sample letter) is to convey:

- That the product in question is subject to a recall;
- That further distribution or use of any remaining product should cease immediately;
- Where applicable and required as part of the recall strategy, that the direct consignee should in turn notify its consignees that received the product about the recall;
- Instructions regarding what to do with the product.
- i. Recall Communication Implementation As determined by the recall strategy, developed in conformance with the recall plan, a recall communication can be accomplished by telephone, facsimile transmission, e-mail, or special delivery letters conspicuously marked, preferably in bold red type, on the letter and envelope "URGENT FOOD RECALL." If firms communicate their recall strategy by telephone calls
- or other personal contacts, FSIS expect the firms to document and follow-up this communication in some written form (e.g., letter, e-mail message, fax).
- ii. Recall Communication Content A recall communication should be written in accordance with the following guidelines:
 - Be brief and to the point;
 - Identify clearly the product, package sizes, lot numbers, codes and any other
 pertinent descriptive information to enable accurate and immediate identification of
 the product;
 - Explain concisely the reason for the recall and the hazard involved;
 - Provide specific instructions on what should be done with respect to the recalled products; and
 - Provide a ready means for the recipient of the communication to report to the
 recalling firm whether it has any of the product, e.g., by allowing the recipient to
 place a collect call to the recalling firm.
 - The recall communication should not contain irrelevant qualifications, promotional

materials, or any other statement that may detract from the message. Where necessary, follow-up communications should be sent to those who fail to respond to the initial recall communication.

The recall plan should specify what means of communication will be used, including sample communications, for various scenarios and contingencies.

- iii. Responsibility of recipient Consignees that receive a recall communication should immediately carry out all instructions set forth therein and, where necessary, extend the recall to its consignees.
- g. Public Notification The purpose of public notification is to alert the public that a product is being recalled. A firm should consider the need for and means of public notification upon initiating a recall. The recall plan should specify what means of public notification will be used, if appropriate, for various scenarios and contingencies such as:
 - General public notification by press release through the general news media, either national or local as appropriate, or
 - Public notification through specialized media, e.g., professional, trade or ethnic press, store placards or to specific customers (if known), etc.

A recall plan should include contact information for all potential media outlets such as television stations, radio stations and newspapers and with local, state and regional coverage areas as well as the national wire services. If the actual contacts are not specified, reference sources of current media contacts for all possible recall scenarios should be specified in the recall plan.

NOTE: Regardless of the public notification action taken by the recalling firm, FSIS will issue a press release for all recalls. The Agency will also post a Recall Notification Report on the FSIS web site (www.fsis.usda.gov/OA/recalls/rec_actv.htm) for all recalls. In addition, the Recall Notification Report will be sent, by means of E-mail and/or facsimile transmission, to public health officials throughout the country.

- h. Effectiveness Checks The purpose of effectiveness checks is to verify that all consignees at the recall depth specified by the strategy have received notification about the recall and have taken appropriate action. The methods for contacting consignees should be specified, for various scenarios and contingencies, and may be accomplished by personal visits, telephone calls, letters, facsimile transmission, or a combination thereof. The recalling firm is responsible for conducting effectiveness checks. This is a means of assessing the progress and efficacy of a recall. The method for determining the number of effectiveness checks to be conducted and the manner for conducting them should be determined, for various scenarios and contingencies, in the recall plan.
- i. Returned Product Control and Disposition The means of controlling and disposing of or correcting the defect in the stock returned during a recall should be specified in the recall plan.

j. Recall Simulations - In order to evaluate its recall plan, the establishment should conduct periodic simulations. A simulated recall should involve the selection, without prior notice to personnel involved in the simulated recall, of at least one lot of product that has been distributed in commerce. A hypothetical reason for recalling the product should be specified then the recall plan should be followed to establish a strategy for recalling the product. The simulation should proceed at least to the point at which communication is to be made beyond the firm's organizational limits, however, full details of who will be contacted at that point and how contact will be established should be specified.

A recall simulation file should be maintained to record the details and results of all simulated recalls. The recall simulation file should include the name, address and telephone number of clients for the test lot, production records, the inventory, and distribution of the test lot. A recall simulation is used to determine whether the recall procedure is capable of identifying and quickly controlling a given lot of potentially affected product and reconciling the quantities produced, quantities in inventory, and quantities distributed. In addition, a recall simulation will identify potential problems and allow personnel to become familiar with recall procedures. If problems are identified during a recall simulation, the recall plan and procedures should be revised to correct the problems.

3. Notifying FSIS of Recalls

FSIS expects that, once it is determined that recall action will be undertaken, the recalling firm will immediately notify FSIS. When doing so, the firm should notify the Emergency Response Division (ERD), OPHS, or the District Manager in the FSIS district where the firm is located. The basic information required includes, but is not limited to, the following (see attached worksheet):

- Complete and accurate product identity.
- The reason for the recall and details about when and how any defect or deficiency was discovered.
- An evaluation of the risk associated with consumption of the product, and how the evaluation was made (although FSIS will make its own determination of risk).
- How much of the product in question was produced and during what period of time.
- An estimate of how much of the product is in distribution and how long it has been in distribution.
- Area of the geographical distribution of the recalled product by state and, if exported, by country.
- Information about which distributors and customers received the product.

- Copies of any company correspondence with distributors, brokers or customers relating to the recall strategy or actions, and a copy of any proposed press release.
- The name, title, and telephone number of the recall coordinator for the company.

This information may initially be provided orally. However, it should be confirmed to the ERD by using the worksheet (attached).

4. Recall Assessment

The firm is expected to regularly, and in a timely manner, report the results of effectiveness checks performed to FSIS in order to keep the Agency apprised of the status of recalls in progress. The reporting frequency will be agreed upon by the recalling firm and FSIS and will be expected to be more frequent as the degree of public health hazard presented increases. FSIS will conduct independent effectiveness checks as specified in FSIS Directive 8080.1, Rev. 3. In addition, the firm is expected to notify FSIS when it appears that the recall has been completed.

Unless otherwise specified, the recall status report should contain the following information:

- The number of consignees notified of the recall, the date and method of notification.
- The number of consignees responding to the recall communication.
- The quantity of product each consignee had on hand at the time the communication was received.
- The number and identity of consignees that did not respond.
- The quantity of product returned or held by each consignee.
- An estimated time for completion of the recall.

5. Recall Termination

A recall will be terminated when FSIS and the recalling firm are in agreement that the product subject to the recall has been removed and proper disposition or correction has been made.

MODEL RECALL NOTIFICATION LETTER

DATE

CUSTOMER FIRM NAME & ADDRESS

ATTN: CONTACT PERSON NAME & TITLE

Re: RECALL OF TYPE OF PRODUCT

Dear Sir or Madam:

This letter is to confirm our telephone conversation that $\underline{\textit{Company}}$ $\underline{\textit{Name}}$ is recalling the following product(s) because $\underline{\textit{Specify Recall}}$ $\underline{\textit{Reason}}$:

Describe the product, including name, brand, code, package size and type, establishment number, etc.

We request that you review your inventory records and segregate and hold the above product(s). If you have shipped any of this product, we request that you contact your customers and ask them to retrieved the product and return it to you. Once you have retrieved all the product, please contact us. We will arrange to have the product shipped to our facility. Please do not destroy the product. We will credit your account for product returned.

We are undertaking this action in cooperation with the Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture. FSIS officials may contact you to confirm that you have received this notice and are cooperating in this action.

Your prompt action will greatly assist <u>Company Name</u> in this action. If you have any questions, please do not hesitate to contact <u>Company Recall Coordinator</u> at <u>Phone Number</u>.

Thank you for your cooperation.

Sincerely,

Company Official Name and Title

EMERGENCY RESPONSE DIVISION RECALL WORKSHEET

(Include attachments, additional pages, label copies and label approvals as necessary.)

TO BE COMPLETED BY TH			TODAYS				
ESTABLISHMENT NUMBERS		P		HACCP PL	ANT :		
ESTABLISHMENT NAME:							
ADDRESS:							
COMPANY RECALL COORDI telephone)		e,					
COMPANY MEDIA CONTACT							
REASON FOR RECALL:							
IDENTIFY RECALL PRODU	ICTS SEPERATELY BY	<u>:</u>					
BRAND NAME							
PRODUCT NAME							
PACKAGE (Type & Size)							
PACKAGE CODE (Use By/Sell By)							
PACKAGING DATE							
CASE CODE (Identifying)							
COUNT/CASE							
PRODUCTION DATE							
AMOUNT (lbs./cases) PRODUCED							
AMOUNT HELD AT ESTABLISHMENT							
AMOUNT (lbs./cases) DISTRIBUTED							
DISTRIBUTION LEVEL (institutional/ret ail/etc) DISTRIBUTION AREA							
EXPORTED TO (country)							
CHILD NUTRITION (CN, AMS Contract)	(YES)	(NO)	(YES)	(NO)	(YE	S)	(NO)
DEPT. OF DEFENSE (DPSC, Commissary,	(YES)	(NO)	(YES)	(NO)	(YE	s)	(NO)

FSIS Directive 8080.1 Revision 3 Amendment 2

CATALOG SALES	(YES)	(NO)	(YES) (NO)	(YES)	(NO)
TO BE COMPLETED BY FS	IS HEADQUARTERS:		PRESS	DATE	
CASE NUMBER:	CLASS:	DEPTH:	RELEASE:		
FSIS COMPLIANCE HQ. Cottlephone)	ONTACT: (name &				